

**BOULT  
CUMMINGS  
CONNERS  
& BERRY**  
PLC

LAW OFFICES  
414 UNION STREET, SUITE 1600  
POST OFFICE BOX 198062  
NASHVILLE, TENNESSEE 37219

Michael B. Bressman  
(615) 252-2399  
Fax: (615) 252-6399  
Email: mbressma@bccb.com

November 29, 1999

TELEPHONE (615) 244-2582  
FACSIMILE (615) 252-2380  
INTERNET WEB <http://www.bccb.com/>

David Waddell  
Executive Director  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

Re: Application of BroadSpan Communications, Inc. d/b/a Primary Network Communications, Inc., Docket No. 99-00789

Dear Mr. Waddell:

Pursuant to your letter of November 19, 1999, BroadSpan Communications, Inc. d/b/a Primary Network Communications, Inc. ("BroadSpan") hereby provides an original and thirteen (13) copies of the following information to supplement its application, which was filed on October 13, 1999 (the "Application").

**Financial**

1. Provide current audited (if available) financial statements for Primary Network Holdings, Inc., BroadSpan Communications, Inc.'s parent company, including the income statement, balance sheet, and statement of cash flows.

**Response:** Attached as a supplement to Exhibit 3 of the Application is a recent balance sheet and income statement of Primary Network Holdings, Inc. ("PNC"). A current statement of cash flows is not available. Because BroadSpan and PNC are privately-held companies and the information contained in Exhibit 3 is confidential and proprietary financial information, Exhibit 3 is being filed under seal pursuant to TRA Rule 1220-1-1-.03(8).

2. BroadSpan stated in its application that a small amount of the income in the financial statements was related to reciprocal compensation for terminating ISP traffic. Please specify the amount of reciprocal compensation related to terminating ISP traffic reflected in BroadSpan's financial statements.

**Response:** In the "Income" section of its "Year to Date Income Statement 1999" (last page of Exhibit 3 filed with its Application), BroadSpan states the small amount of reciprocal compensation it has been paid.

**Toll Dialing Parity Plan**

The Toll Dialing Parity Plan should:

1. Include a statement in the plan stating the implementation date is concurrent with offering service.
2. Accomplish IntraLATA Toll Dialing Parity by a means other than automatically assigning toll customers to itself or any other carrier.
3. Identify the LATA with which it is proposed to associate.
4. Include a statement that the carrier will comply with all rules of the FCC and the TRA.

**Response:** BroadSpan's toll dialing parity plan has been revised to reflect these requirements. The revised plan is attached as Exhibit 8 and replaces the Exhibit 8 filed with the Application.

**Miscellaneous**

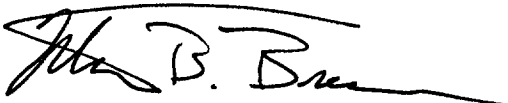
1. Provide a chart reflecting the applicant's corporate structure.

**Response:** Attached as Exhibit 9 is BroadSpan's corporate structure chart.

If you have any questions concerning this information or other information provided by BroadSpan Communications, Inc., please call me.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:   
Michael B. Bressman

Attachments

cc: Carsie Mundy

*[Handwritten initials]*